

SCOPING DOCUMENT

STILLWATER MINING COMPANY'S HERTZLER TAILINGS IMPOUNDMENT PROJECT

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Prepared by-

**Montana Department of Environmental Quality
U.S. Forest Service, Custer National Forest**

Prepared for-

**EIS Scoping Meeting
Absarokee, MT**

August 1996

SCOPING DOCUMENT

STILLWATER MINING COMPANY'S

HERTZLER TAILINGS IMPOUNDMENT PROJECT

The Stillwater Mining Co. has submitted a proposed amendment to its operating permit #00118 for the Stillwater Mine located outside Nye, Montana, in Stillwater County. Because this amendment would be a major revision of the operating permit and plan of operations, an environmental analysis of the proposal must be prepared. This analysis will be presented for public disclosure, review, and comment in an environmental impact statement (EIS).

The first phase in completing an EIS is to conduct "scoping." The purpose of scoping is to identify the environmental issues associated with the project. This Scoping Document will acquaint you with the proposed Hertzler Tailings Impoundment Project and the EIS and decision-making processes. The agencies welcome your comments on the issues that you believe should be addressed in the EIS.

These may be submitted at the public meeting in Absarokee, Montana, on September 24, 1996, or mailed by **October 31, 1996**, to one of the following people:

Kathleen Johnson, Project Coordinator
Montana Department of Environmental Quality
P.O. Box 200901
Helena MT 59620-0901

Rand Herzberg, District Ranger
Beartooth Ranger District
HC49, Box 3420
Red Lodge, MT 59068

THE PROPOSED ACTION-

HERTZLER TAILINGS IMPOUNDMENT PROJECT

Description of Proposed Facilities/Operations

The Montana Department of Environmental Quality (DEQ) and the U. S. Forest Service (USFS) received an application for an Amendment to Hard Rock Mine Operating Permit #00118 for the Stillwater Mine from the Stillwater Mining Company (SMC) on April 29, 1996. The Stillwater Mine is located approximately 5 miles southwest of Nye, Montana (see **Figure 1**). SMC proposes to construct and operate a new tailings impoundment located approximately 7 miles northeast of the mine site (2 miles northeast of Nye), install a pipeline system along Stillwater County Road 420 and reclaim the resulting surface disturbance, and expand the waste rock storage area located on the east side of the Stillwater River at

the mine site (see **Figure 2**).

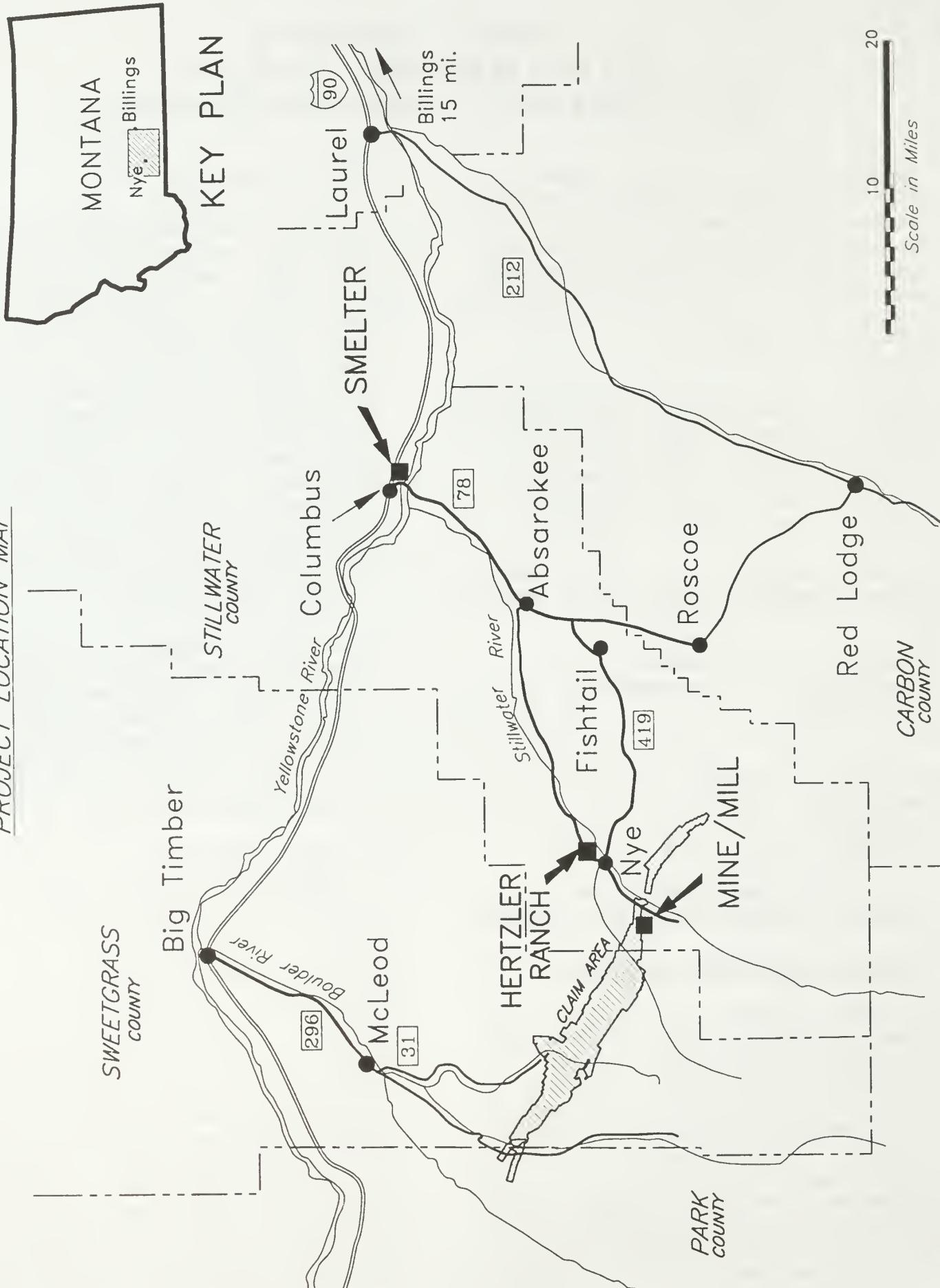
The Hertzler Impoundment site would be located on the Hertzler Ranch, owned by SMC. The underground pipeline system would be located in the county road right-of-way and the waste rock repository would be primarily located on patented mining claims. Implementation of this proposed amendment would require relocation of the Land Application and Disposal system (LAD) currently located on the east side of the Stillwater River where the proposed waste rock storage area would be built to the Stratton Ranch (1½ miles northeast of the mine along Stillwater County Road 420) and/or the Hertzler Ranch (see **Figure 2**). The existing mine permit area encompasses approximately 1,340 acres. Approximately 120 acres of the 255 acres currently permitted for mine-related disturbances have been disturbed by mining and exploration. This proposed amendment would result in an additional 288 acres of disturbance and increase the total permit area by 1,112 acres to a total of 2,452 acres.

Hertzler Tailings Impoundment. Implementation of the proposed amendment would require the construction of a second tailings impoundment in order to allow operational flexibility and increase the tailings storage capacity. This would allow over 30 more years of mine operation at an average production rate between 2,000 and 3,000 tons of ore per day. The current impoundment would reach its capacity in 2003 if this proposed amendment is denied.

The proposed Hertzler tailings impoundment would have the capacity to store approximately 16 million cubic yards (15 million tons) of tailings. The tailings would consist primarily of the slimes component (fines) and excess sands not used for mine backfill. Tailings also would be excavated from the existing impoundment and pumped through the pipelines to the proposed Hertzler tailings impoundment. The proposed impoundment would cover 163 acres and reach a maximum height of approximately 155 feet (elevation 5,036 feet) (see **Figure 3**). Because of the long haul distance from the mine, the embankment would be constructed of on-site borrow material rather than waste rock from the mine. The embankment would be constructed in stages using the downstream method (see **Figure 4**). The height of each stage would vary with the estimated proposed storage volumes; the first stage would consist of an embankment approximately 78 feet high (elevation 4,958). Embankment slopes would be constructed no steeper than 2:1 (2 feet horizontally to 1 foot vertically). The tailings would be deposited behind the

STILLWATER MINING COMPANY
MINE WASTE MANAGEMENT PLAN
PROJECT LOCATION MAP

CAD FILE: \PROJECT\1-3331\FIGA4 Scale 1"=10 miles Plat scale 1:10



Apr. 22, 1996
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Figure 1

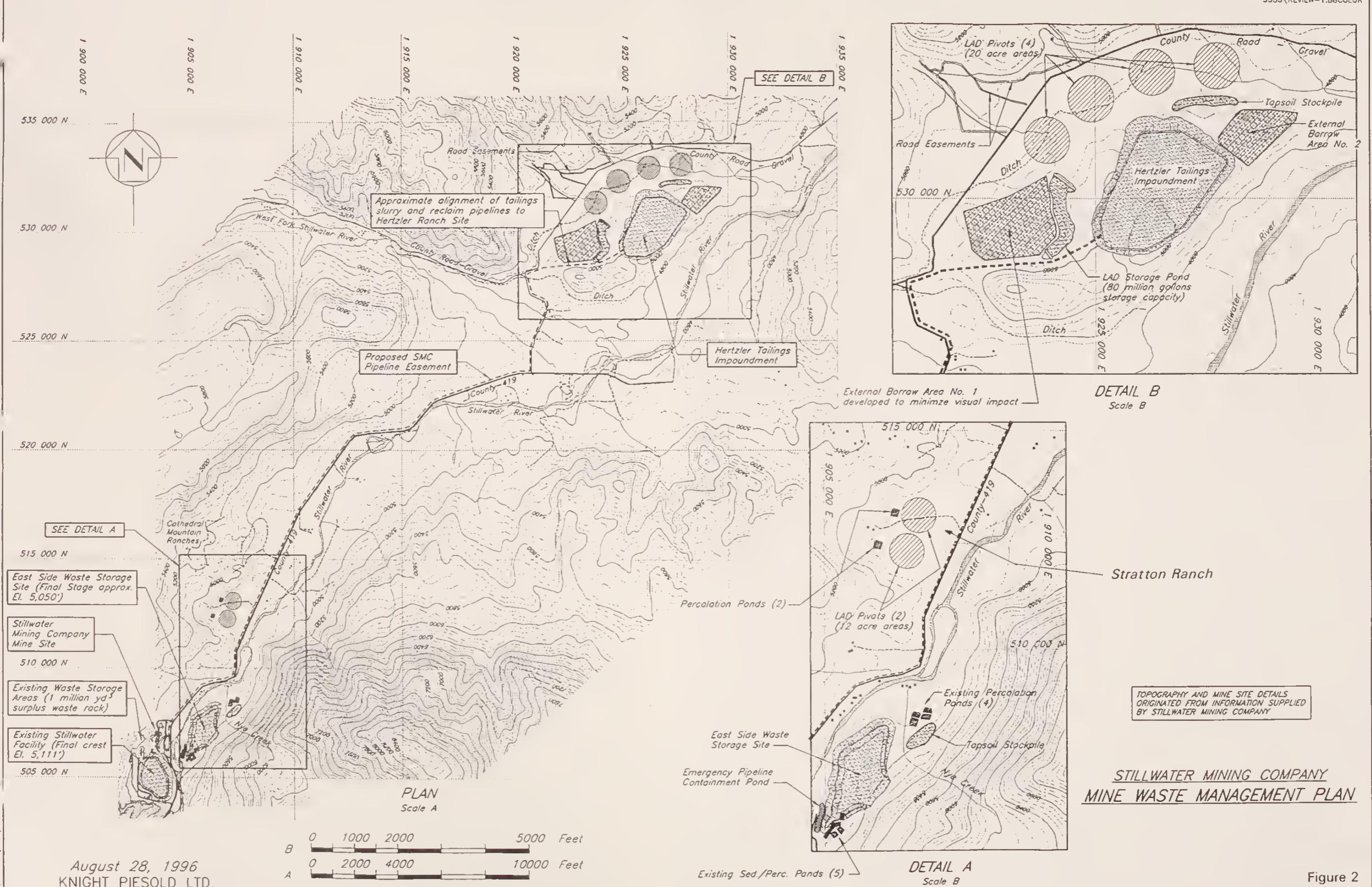
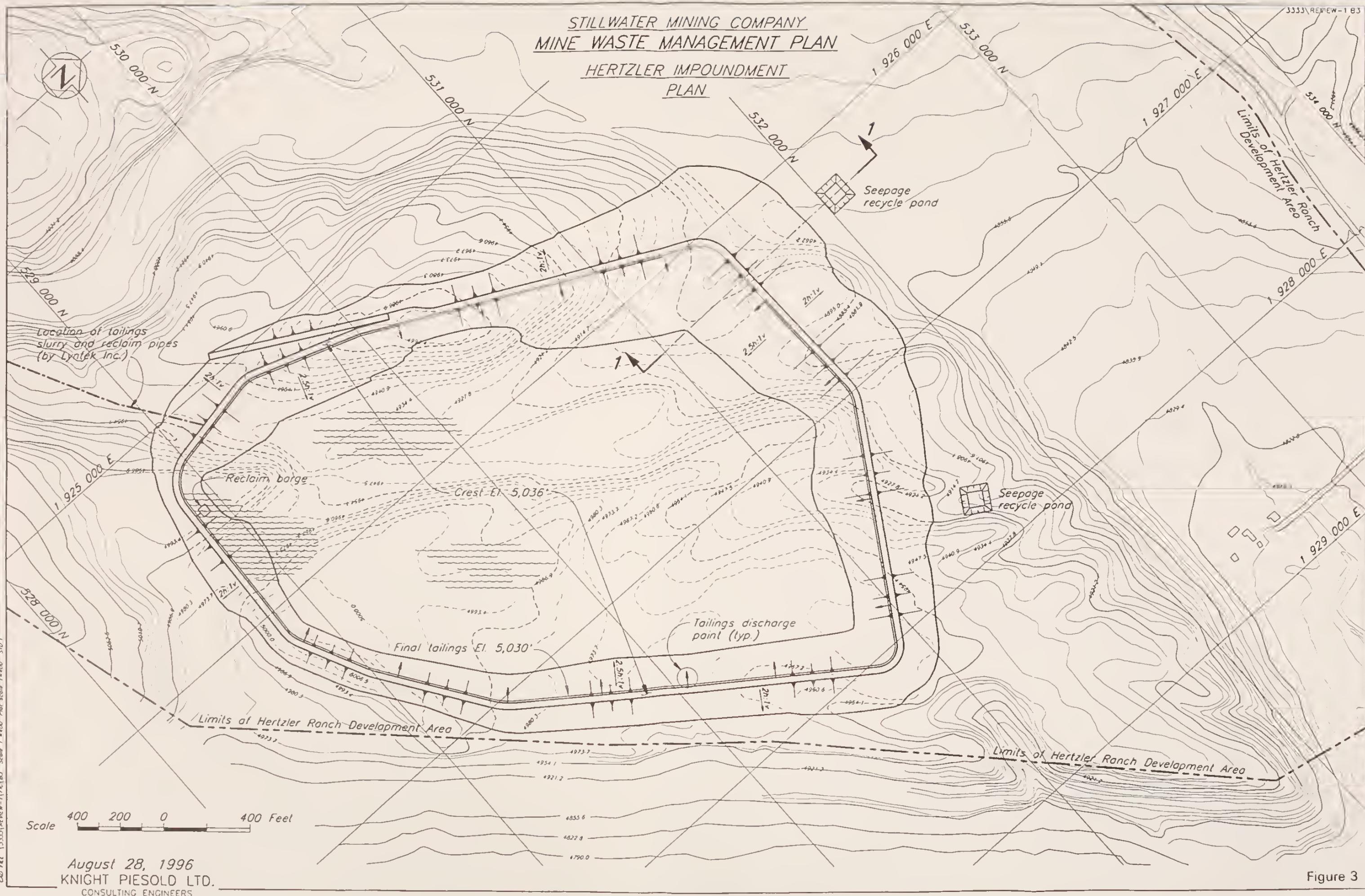
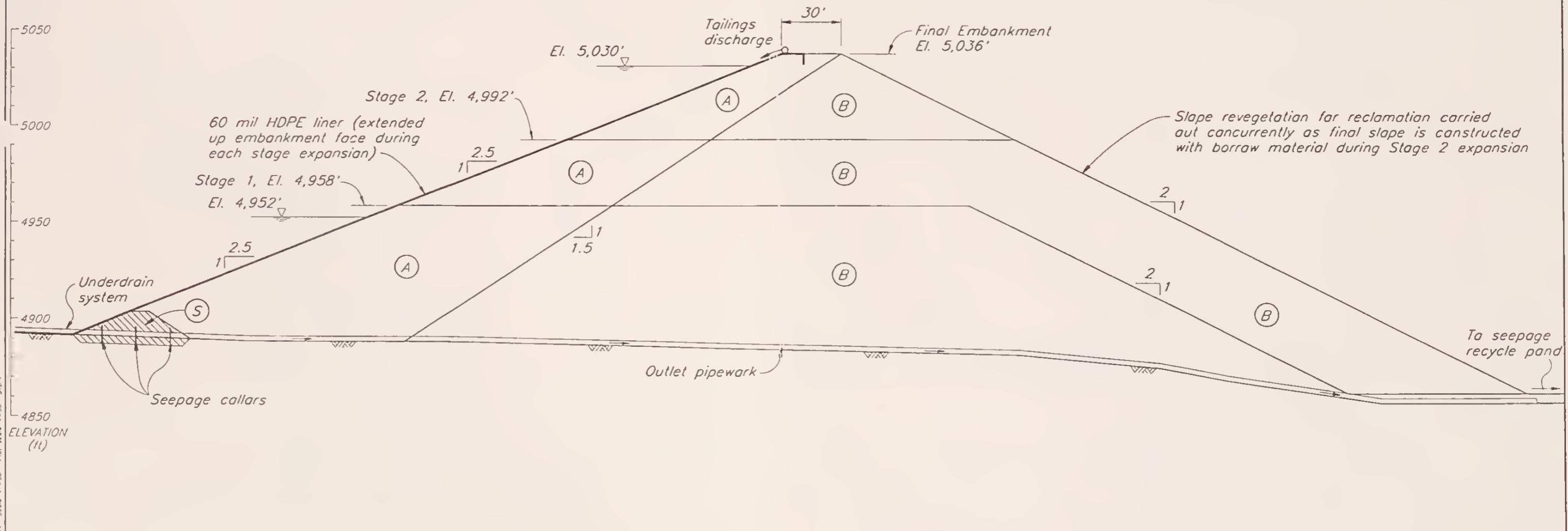


Figure 2



STILLWATER MINING COMPANY
MINE WASTE MANAGEMENT PLAN
HERTZLER IMPOUNDMENT
TYPICAL SECTION

ZONE	MATERIAL TYPE
(S)	Low Permeability Glacial Till
(A)	Glacial Till
(B)	Random Fill





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embankment as a slurry (a tailings and water mixture piped from the mill).

The impoundment would be lined with a high density polyethylene (HDPE) liner 60 mil thick to reduce the amount of seepage to groundwater beneath the impoundment. Seepage also would be intercepted through a system of underdrains built of corrugated polyethylene perforated pipe covered by a filter media. The seepage collected by these underdrains would drain into lined recycle or reuse ponds located around the exterior of the impoundment. This tailings water would be pumped back either to the tailings impoundment surface or to the mill for reuse in the milling and concentrating processes.

Mine Waste Rock Production and Management. Under current operations, most waste rock from mine operations which is not used for mine backfill or to construct mine portal pads, roads, and other mine-related uses is used to construct the embankments of the existing tailings impoundment located on the west side of the Stillwater River. Excess waste rock is placed in one of three other areas permitted for mine waste rock storage: a temporary storage area above the existing tailings impoundment, a permanent storage area near the 5,300 foot west portal, and the permanent berm on the east side of the river currently being constructed that will act as a visual buffer to screen some east side mine facilities from view of traffic using the county road and residents of Cathedral Mountain Ranch on the other side of the river.

The long haul distance from the mine to the proposed impoundment site (7 miles) would prevent the use of mine waste rock to construct the proposed Hertzler tailings impoundment embankment. Therefore, SMC proposes to expand the waste rock storage area and berm on the east side of the Stillwater River. This expansion would increase the storage capacity by approximately 80 million cubic yards and increase the storage site to approximately 80 acres.

A portion of the area proposed to be used for waste rock storage includes the site of some old chrome tailings stockpiles that were deposited during mining between 1940 and 1960. The residual tailings have been difficult to reclaim due to shallow soils, sandy subsoils, and severe wind erosion. The proposed waste rock storage area would cap a major portion of these residual chrome tailings and would provide a suitable environment for establishing a sustainable vegetative cover.

This facility, referred to as the east side waste rock facility, would be constructed with an irregular surface to blend in with the surrounding natural terrain. Embankment slopes would vary between 3:1 and 2:1. Lower slopes would be flattened to 3:1 minimize erosion in case of a probable

maximum flood (PMF). Existing water monitoring activities that would be disrupted by the waste rock storage area expansion would be either relocated or modified to accommodate the waste rock storage facility. Additional monitoring wells would be added as needed. The east side waste rock storage area would be constructed in three phases (see **Figure 5**).

Pipeline Systems. The pipeline system (approximately 41,000 feet long) would be located along Stillwater County roads 419 and 420 right-of-ways between the mill and the proposed tailings impoundment site at the Hertzler Ranch. The pipeline system would consist of four pipes buried approximately 5 feet deep (below the frost line) including under all stream and drainage crossings and the West Fork of Stillwater River. Two pipelines would be dedicated for tailings slurry transport. These would be constructed of 8-inch steel pipe lined with an inner sleeve of HDPE. One 12-inch steel pipeline would transport mine water for LAD and one 10-inch steel pipeline would be for returning reclaimed tailings impoundment water to the mill for use as process water. The system would require a series of pumps and backup pumps at the tailings pumping station near the mill.

Pipeline flow would be monitored at both ends of the pipelines. Moisture and pressure would be monitored at five inspection vaults located along the pipeline system. An emergency containment facility comprising two of the inspection vaults with monitoring instrumentation would be constructed on both sides of the West Fork Stillwater River. If there was a pipeline rupture, emergency containment ponds would be constructed immediately at the site of the rupture and then the surface disturbance reclaimed when the pipeline repair was completed.

Mining Methods. SMC uses cut-and-fill, sublevel, and ramp-and-fill stoping methods. All methods incorporate the backfilling of mined out workings with sandfill (sand component of the tailings) and/or mine waste rock. The backfill material is placed in a worked out area and creates the floor for mining the next level of ore, and provides ground support for adjacent working areas, minimizing the risk of subsidence. Backfilling also reduces surface storage requirements for the tailings and mine waste rock. Approximately 58 percent of the tailings created during the milling process are returned underground as backfill for mined out areas. SMC is not proposing to change its method of mining although it will continue to make improvements to ensure safe and efficient mining of the ore body.

Production Volume. SMC is presently in the process of expanding production from 1,000 tons of ore per day to 2,000 tons per day. The concentrating facilities at the mill can be adapted to accommodate in excess of 3,000 tons per day with

minor modifications to the facility without additional surface disturbance. SMC proposes to operate the mine at an average rate of 2,000 tons per day with peak production rates of 3,000 to 5,000 tons per day possible. The approval of the proposed additional waste storage facilities would allow the company the operational flexibility to increase production rates which would in turn increase the economic viability of the operation.

Milling Methods. Ore is initially crushed underground and transported to the surface, where it is further crushed and ground to a fine material. This ground material is separated in large flotation cells in the concentrator where flotation chemicals are added to capture the platinum and palladium. For every 100 tons of concentrate fed to the mill, 99 tons of tailings are generated. The tailings are pumped from the concentrator to an underground sand plant where the sand component is separated from the slimes. The slimes, and whatever sands cannot be used as backfill, could be pumped to either the proposed Hertzler tailings impoundment or the existing tailings impoundment depending on operational requirements under the proposed amendment. However, the tailings would most likely be deposited into the existing impoundment and then would be excavated out, thickened or partially dewatered, and pumped through the pipeline to the proposed Hertzler tailings impoundment to avoid having to construct duplicate facilities at the existing impoundment and in the mill for preparing tailings for direct discharge into the pipeline system.

Power Requirements. Currently the MPC powerline servicing the mine is capable of providing up to 18 megawatts of power. The mine requires approximately 12 megawatts to mine and process 2,000 tons of ore per day. SMC plans to operate at an average of 2,000 tons per day but production could peak as high as 5,000 tons per day. An additional 4 megawatts would be required for each additional 1,000 tons of ore processed per day.

The development of the Hertzler Impoundment would include approximately a one-mile extension of the existing three-phase powerline from a point near the junction of Stillwater County roads 419 and 420. This extension would provide for an operational power demand of approximately 500 horsepower at the Hertzler Ranch location.

Roads and Traffic. No modifications are proposed for existing and previously approved permit-related roads within the permit boundary. Access roads to the Hertzler Ranch (Stillwater County Roads 419 and 420) may be upgraded to allow for installation of the buried pipeline system within the right-of-way. SMC would negotiate an agreement with Stillwater County for the upgrades which would constitute an amendment to the company's Hard Rock Impact Plan for Stillwater County.

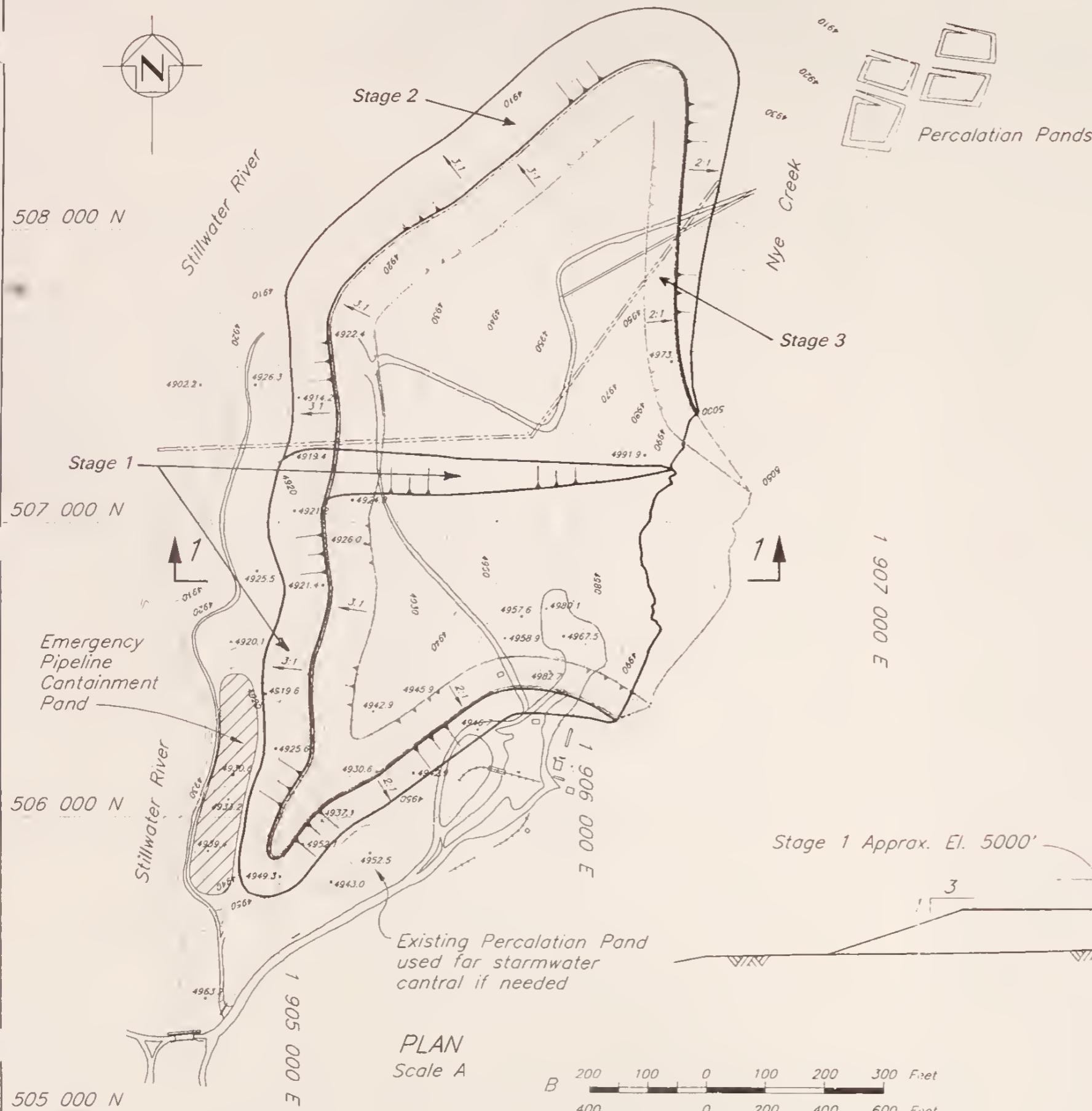
Minor road extensions from Stillwater County Road 420 to the Hertzler impoundment would be required. These extensions would be reclaimed after closure and reclamation of the proposed impoundment.

Workforce Requirements/Socioeconomics. Present economic indicators and estimated ore reserves suggest that the operational life of the Stillwater Mine could be extended another 30 years. Workforce requirements for the operation depend on production levels and the mining method used. SMC's current Hard Rock Impact Plan for Stillwater County requires that the plan be amended should workforce levels exceed 15 percent of those projected in its 1988 plan amendment; this revision level is 525 employees. It is projected that implementation of this proposed revision would increase mine employment to approximately 650 workers with 40 to 45 percent of the additional workers expected to be local residents. This increase would trigger a revision to SMC's Hard Rock Impact Plan. However, SMC anticipates that future expansion of underground production would be accompanied by a shift toward mechanized mining and sublevel extraction which is less labor intensive than conventional cut and fill mining methods. These potential shifts in mining methods would not be expected to reduce the present workforce requirement but may reduce the need for expanding the workforce as mine production increases.

Monitoring

Tailings and Waste Rock. Once each year, SMC combines samples from all mine waste rock storage sites including the existing tailings embankment for laboratory analysis to verify the lack of acid generating potential of the materials. The tailings also are sampled separately and tested for acid generating potential. The tailings at the proposed Hertzler tailings impoundment would be included in this sampling program. This sampling program would continue for the life of the mine and would be expanded to include any new storage sites. Sampling this ore body for over 20 years has shown no capacity for acid generation.

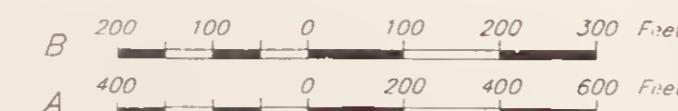
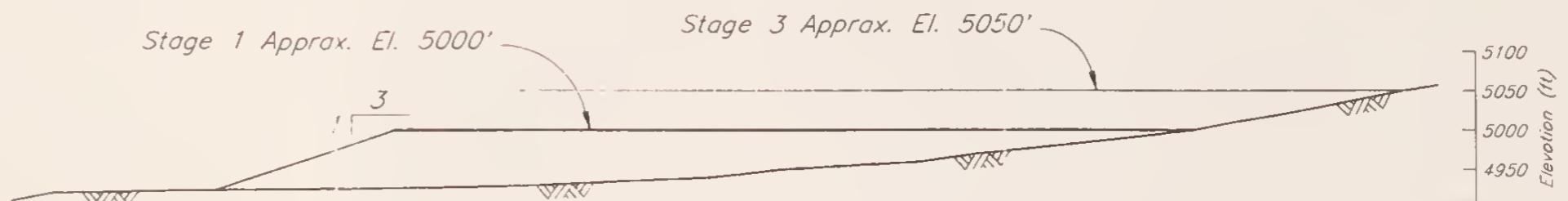
Pipeline System. The pipelines would be physically inspected for pipe wall thickness and unusual wear patterns from the five inspection vaults installed in selected portions of the pipeline. Manholes located every 2,500 feet along the pipeline would be used for visual and manual instrumentation inspections. Leak detection devices would be installed to monitor pipeline flow and pressure at the main pump station near the mill and at a location just before the pipeline discharge point into the Hertzler tailings impoundment (the terminal station). A rapid pressure drop could indicate a pipeline rupture, while decreased flows and higher pressure could indicate pipeline blockage. Moisture-sensing devices would be installed in the double-lined slurry pipes at the West



STILLWATER MINING COMPANY
MINE WASTE MANAGEMENT PLAN
PLAN AND SECTION OF
EAST SIDE WASTE STORAGE SITE

NOTES

1. Construction Sequence:
 - Stage 1 — Placement of a visibility and containment berm to approximately El. 5000'.
 - Stage 2 — Extend visibility and containment berm northward.
 - Stage 3 — Extension of Stages 1 and 2 by raising to approximately El. 5050'.
2. Visibility and containment berm constructed to resemble a natural feature with vertical and horizontal relief varying in order to break up visual lines. Slope gradients to vary from 2H:1V to 3H:1V.
3. Toe of the visibility and containment berm to be placed a minimum of 100 feet from riparian zones.



Fork of the Stillwater River crossing. If any of the sensors were to indicate abnormal conditions, the pipelines would be flushed, shut down, and a more intensive investigation undertaken.

Water Quality. Stormwater containment measures and sampling would follow the currently approved Stormwater Pollution Prevention Plan which is on file with the agencies. In the event of a stormwater discharge to surface waters, SMC would sample and report the discharge as required by the approved stormwater MPDES (Montana Pollution Discharge Elimination System) permit.

If the proposed amendment is approved, SMC would be required to modify its groundwater monitoring plan and submit it to DEQ for approval. This plan would incorporate the placement of additional monitoring wells in the areas proposed for development and would specify the sampling intervals and parameters for testing. These areas would include the Hertzler tailings impoundment site, the east side waste rock storage area, and any areas upon which LAD and/or percolation ponds are constructed.

The water quality monitoring plan for the impoundment, which must be approved by the agencies, would specifically include the following components:

- Sampling of process water in the tailings pond and seepage recycle ponds for water quality analyses;
- Sampling of groundwater in monitoring wells;
- Sampling of surface water quality down gradient of the impoundment; and
- Flow monitoring in the seepage collection system within the impoundment.

Reclamation

Existing Tailings Impoundment. The embankments would be reclaimed immediately, but the surface could not be reclaimed as tailings would be continually added from the mill and then removed and pumped to the proposed impoundment. Final reclamation of the surface of the existing impoundment would be delayed until the proposed Hertzler tailings impoundment was closed and reclaimed. All reclamation would be done according to plans in the existing permit.

Hertzler Tailings Impoundment. The top 12 inches of topsoil and subsoil (hereafter referred to as "soil") within the proposed impoundment site would be salvaged and used either for concurrent reclamation of the embankment or stored for use in final reclamation of the surface. Additionally, borrow within the Hertzler Ranch area would be used as a "soil substitute" (see **Figure 2**). The borrow material would consist of alluvial and glacial till subsoils. Although the

borrow lacks some characteristics of topsoil, it is a suitable growth media. The gravel content of this material also would make it less erosive than topsoil alone; it is this characteristic that has made similar borrow within the permit area suitable for use on the existing impoundment and waste rock storage embankment slopes within the permit area. The extra volumes of material have made it possible to reclaim areas where existing soils are very shallow. Since this material would also be used to construct the embankment, the primary soil requirement would be the amount needed to reclaim the surface of the impoundment upon closure.

The outer embankment slope would be reclaimed concurrently with the operation of the facility to minimize visual impact and fugitive dust. Reclamation is concurrent when a disturbance is reclaimed as soon as possible within the same season. For example, a lower lift of an embankment might be reclaimed as soon it was constructed and at the same time as the next lift was being built. Conversely, reclamation would not be concurrent if a disturbance was not reclaimed for a number of years. A minimum of 12 inches of soil and/or soil substitute would be placed on the outer surface of the embankment and revegetated with an approved seed mix.

Final reclamation, revegetation, and closure would follow the same procedures specified in SMC's approved plan for the existing tailings impoundment. The surface of the impoundment may settle between 1 and 10 feet depending on the distribution and thickness of the tailings. An average cap of 5 feet (including a minimum of 24 inches of soil or soil substitute) would be placed on the impoundment surface after dewatering and regrading.

Prior to closure, SMC would conduct a capping study of the in-situ tailings to determine the degree of consolidation and settlement. This information would be used by the agencies and SMC to determine potential long-term settling that might compromise the reclamation cap, cause a safety hazard, create ponding of stormwater on the surface, or create pathways for surface water pollution and incorporate this into final surface regrading plans.

East Side Waste Rock Storage Area. During each stage of construction, the visibility and containment berms would be regraded, topsoiled, and revegetated. The outer edges of each lift of the waste rock storage area would be reclaimed concurrently as the lifts were completed. After Stage 3 is completed, the waste rock storage area would be regraded to blend with the surrounding natural terrain, capped with subsoil, topsoiled with 12 inches of soil, and revegetated. Riprap and permanent stormwater drainage diversions would be installed along the east and northeast sections of the storage site between the No Name and Nye Creek drainages if necessary.

Pipeline System. The surface disturbance along the pipeline would be reclaimed immediately after pipeline installation. Twelve inches of salvaged soil would be placed over the compacted fill above the pipe. The surface would then be revegetated with an approved seed mix. Following closure of the Hertzler tailings impoundment, the inspection ports and manholes would be removed; the surface would then be regraded, topsoiled with 12 inches of soil, and revegetated. The pipelines would remain buried in the ground.

Bonding

Reclamation bonds are determined by the agencies and are held by DEQ; the USFS may require additional bonds if it decides that the state's bond is insufficient. The bonds are determined by computing costs to the state and the USFS for reclaiming a site should the operator default. The state is required to review all active permitted mine bond amounts a minimum of every 5 years. If a bond is determined to be insufficient, it is recalculated and the company is required to submit the additional amount. SMC's current bond for the Stillwater Mine is \$3,174,000.

If this amendment is approved, the additional bond would be calculated using the approved and permitted amendment specifications and stipulations. The bond would include costs for long-term maintenance of water treatment facilities such as percolation ponds and diversion ditches, demolition of buildings and other facilities, earth movement and soil replacement, seedbed preparation, and revegetation.

AGENCY RESPONSIBILITIES

The Montana Department of Environmental Quality (DEQ) and the Custer National Forest (CNF) are the lead agencies for this project. Mark Simonich, Director of DEQ, and Nancy Curriden, Custer National Forest Supervisor, are the responsible decision-making officials for the proposed Hertzler Tailings Impoundment project. A December 11, 1989, Memorandum of Understanding (MOU) between the State of Montana and the U.S. Department of Agriculture, Forest Service, promotes efficiency and effectiveness in the administration and regulation of locatable mineral activities under the agencies' respective authorities and responsibilities. This MOU provides for the preparation of joint environmental analyses, sharing of information, personnel, and funds.

Procedures governing the decision-making process on state and private lands in Montana are defined in administrative rules implementing the Montana Environmental Policy Act of 1971 (MEPA). This law requires that if any action taken by a state agency may "significantly affect the quality of the human environment," an environmental impact statement (EIS) must be prepared. The National Environmental Policy Act of 1969

as amended (NEPA) has a similar decision-making process requirement for federal agencies when a proposed project that may "significantly affect the human environment" would be located on federal lands.

Decision-making Authority. DEQ administers the Montana Metal Mine Reclamation Act (MMRA) (Title 82, Chapter 4, Part 3, MCA) and its regulations (ARM 26.4.101 et seq.), under which SMC has applied for an amendment to its operating permit #00118. CNF regulates SMC's current plan of operations, which correlates to the state's operating permit, and any amendments or revisions to the approved plan under the Forest Service's authority to regulate all activities and uses of National Forest System lands (Organic Administration Act of 1897 and 36 CFR 228). After the final EIS has been issued, DEQ and CNF will make a decision regarding SMC's permit amendment request. This decision will be documented in a Record of Decision (ROD). The process will lead to one of the following possible decisions: (1) approval of the proposed amendment of the approved permit/plan of operations, (2) approval of an agency alternative to the proposed amendment, (3) approval of an action alternative subject to identified stipulations, or (4) denial of the proposed amendment. The proposal, if approved, must comply with all applicable federal and state air and water quality laws and regulations.

A finding that the mining or reclamation plans would violate laws administered by DEQ, would be grounds for DEQ to deny the permit amendment (82-4-351, MCA). A permit also may be denied if a person, or any firm or business association of which that person was a principle or a controlling member, has a bond forfeited (82-4-360, MCA) and has failed to reclaim an operation within 2 years after the completion or abandonment of operations on any segment of a permit area, unless otherwise specified by the department (82-4-341(7), MCA).

The USFS is mandated to encourage the exploration, development, and production of mineral resources on all National Forest System lands open to mineral entry (the Mining and Mineral Policy Act of 1970 and a number of executive orders). According to the Custer National Forest's 1986 Land and Resource Management Plan, the CNF must "consider other resources and impacts [from mining] will be mitigated to the extent possible through standard operating procedures. ... Energy/mineral development will not be precluded by these resource concerns within legal constraints. Efforts will be made to avoid or mitigate resource conflicts. If the responsible official determines that conflicts cannot be adequately mitigated she/he will resolve the conflict in accordance with the management goal and, if necessary, in consultation with affected parties" (1986 Forest Plan, page 58).

THE PERMITTING AND ENVIRONMENTAL IMPACT STATEMENT PROCESSES

Completeness Review of Application. When DEQ, the USFS, and other cooperating state and federal agencies review an application for revising or amending the approved permit/plan of operations they jointly review it to determine if it is complete. DEQ has not yet declared SMC's application complete. After reviewing the application, the agencies have requested clarification of components of the proposal and other additional information. When the agencies have determined that all the required information has been submitted, DEQ will declare the application complete. SMC has submitted responses to the agencies' first set of completeness questions. The first set of questions and responses are usually the most detailed and the most likely to result in modifications to the company's proposal. Subsequent completeness questions usually include requests for further clarification rather than requests to modify the proposal or submit new data or plans.

The EIS Process. The two lead agencies may initiate the EIS process either during the review for completeness or after completeness has been determined. The EIS process for SMC's proposed revision was begun before the application was declared complete. Additional questions regarding the adequacy of baseline information or the proposal may arise after completeness is declared or at any time during EIS preparation. Any information necessary to complete the environmental analyses must be submitted by SMC. All information submitted by SMC for either completeness or adequacy are available for public review at the lead agencies' offices during business hours.

Scope of the Environmental Analysis. The environmental analysis phase of the EIS process will begin after scoping. **Scoping** is the collection of written and verbal comments from the public, which helps the agencies identify environmental issues associated with the project. The EIS will present an analysis of the issues as they relate to the physical, biological, social and economic effects of the proposed project and various alternatives. The EIS also will include analysis of the impacts of the project in combination with other past, present, or reasonably foreseeable activities in the project area. The analysis will focus on significant and substantive issues identified during scoping.

Environmental issues initially identified by the agencies are listed at the end of this document. The list of issues will be revised to include additional issues submitted by the public at the scoping meeting, or by mail.

The agencies will develop alternatives in response to the significant and substantive issues identified during scoping. Reasonable alternatives will be developed to provide a clear basis for choice among options by the decision makers and the public (40 CFR 1502.1). Mitigation measures will be identified to avoid, minimize or reduce the magnitude or intensity of the potential adverse impacts. The agencies also will analyze the "no action" alternative which is used as the basis for comparisons. The "no action" alternative assumes existing situation and trends continue.

Public Participation. DEQ and the USFS encourage your participation in the EIS process. You may submit oral or written comments at the public scoping meeting or mail scoping comments to the agencies.

After publication and distribution of the draft EIS, the agencies will solicit public comment on the environmental impact analysis. A final EIS will address all substantive public comments.

DETAILED INFORMATION AVAILABLE

A copy of the mine permit application can be reviewed at:

- Montana Department of Environmental Quality, Helena, MT;
- Custer National Forest, Beartooth Ranger District, Red Lodge, MT; and
- Stillwater County Planning Office, Columbus, MT

If you have any questions, please contact Kathleen Johnson, DEQ, at (406) 444-1760, or Pat Pierson, CNF, at (406) 446-2103 or at the addresses listed at the beginning of this document.

POTENTIAL ISSUES RELATING TO THE PROPOSED HERTZLER TAILINGS IMPOUNDMENT PROJECT

The USFS and DEQ have identified nine preliminary issues to be addressed in the environmental impact statement. These issues relate to possible changes in the existing environmental conditions that might result from the construction, operation, and reclamation of the proposed Hertzler Tailings Impoundment Project. The potential issues are briefly summarized below:

Water Quality: Would the proposed tailings impoundment affect the quality and quantity of groundwater and surface waters? If there are any changes, would these changes exceed Montana's water quality standards, including nondegradation? How would SMC's MPDES (Montana Pollution Discharge Elimination System) permit be affected? Would stormwater runoff from the east side waste rock storage area affect surface water quality of nearby creeks and the Stillwater River? Would LAD of mine water affect the quality of groundwater or surface waters? Would a breach in the tailings slurry lines affect surface water quality of nearby creeks, the Stillwater River, and the West Fork of the Stillwater River?

Wildlife: Would the construction and operation of the tailings impoundment displace or otherwise affect wildlife such as mule deer or their habitat? Would the construction and operation of the east side waste rock storage area affect the local bighorn sheep population?

Air Quality: Would the construction and operation of the proposed Hertzler tailings impoundment and the east side waste rock storage area generate dust or other pollutants that would violate SMC's existing air quality permit? Would the delay in the final reclamation of the existing impoundment generate an undue dust problem?

Socioeconomics: How would the implementation of the proposed project affect SMC's approved Hard Rock Mining Impact Plan? What impact would the influx of additional workers and their families have on existing county infrastructure, housing development, and school systems?

Aesthetics: Would noise from the construction of the tailings impoundment affect nearby residences? What would be the visual impacts to travelers on nearby public roads, residences and the town of Nye from the tailings impoundment? What visual impact would the construction and operation of the east side waste rock storage area have on travelers on nearby county roads, residents at Cathedral Mountain Ranch, and the public using nearby National Forest System lands? Would the delay in final reclamation of the existing tailings impoundment create a visual impact?

Tailings Impoundment Stability: What is the potential for a major earthquake in the area? Could the proposed Hertzler tailing impoundment resist catastrophic failure in the event of an earthquake? How would such a failure affect the surrounding lands, nearby residences, wildlife, fisheries, and surface waters, including the Stillwater River?

Fisheries: Would fisheries in the Stillwater River be affected by the proposed project and any discharge to surface waters from the proposed facilities?

Transportation: How would the installation and operation of the pipeline system affect public use of and access to public roads, specifically Stillwater County roads 419 and 420?

Utilities: What would be the impact of moving MPC's and Beartooth Electric's powerline during construction of the east side waste rock storage area? What would be the impact on power consumption and service if production was increased up to 5,000 tons of ore per day?

